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October 12, 1995

BY HAND DELIVERY

Mr. William F. Caton

Acting Secretary

Federal Communications Commission

1919 M Street, N.W.

Room 222

Washington, D.C. 20554

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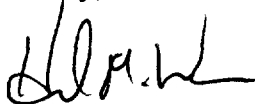
Re: MM Docket No. 95-134

Dear Mr. Caton:

Enclosed for filing on behalf of WWGP Broadcasting Corporation, licensee of Radio Station WFJA (FM), are an original and four (4) copies of the Company's Comments and Counterproposal in the above-captioned proceeding.

Should any questions arise in connection with this matter, please contact the undersigned.

Sincerely,



Howard M. Weiss

Enclosures

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OCT 12 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

**Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Sanford, North Carolina)**

MM Docket No. 95-134

WWGP Broadcasting Corporation, licensee of Radio Station WFJA(FM), Sanford, North Carolina ("WFJA"), by its attorneys, hereby offers the following Comments and Counterproposal in response to the Notice of Proposed Rulemaking (Released: August 21, 1995) ("NPRM") issued in the above-captioned proceeding.

Woolstone Corporation ("Woolstone") filed a petition for a rulemaking with the Commission requesting the allotment of Channel 276A to Sanford, North Carolina, as the community's second local commercial FM transmission service. At present, one commercial FM station, one non-commercial FM station, two commercial AM stations, and two LPTV stations are licensed to Sanford, a community of some 22,000 persons located in the Sandhills of North Carolina. According to the Commission, Channel 276A can be allotted to the community with a site restriction of 11.3 kilometers (7 miles) west to avoid a short-spacing to vacant, but applied for, Channel 275A at Raleigh, North Carolina. In the NPRM, the Allocations Branch sought comments on the proposed allotment of Channel 276A to Sanford, North Carolina.

Among its other duties, the Commission is charged by Section 307(b) of the Communications Act of 1934, as amended, with making such distribution of frequencies and operating power "among the several states and communities as to provide a fair, efficient and equitable distribution of radio service." In implementing its duty under Section 307(b), the Commission has adopted certain criteria to assist in advancing such policies for the radio service. The Commission's current priorities for choosing between conflicting allocation proposals are as follows:

- (1) First full-time aural service;
- (2) Second full-time aural service;
- (3) First local service; and
- (4) Other public interest matters.

Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 51 R.R. 2d 807 (1982) ("1982 Revision"). See also, FM Table of Allotments, 40 FCC 747, 752 (1963).

COUNTERPROPOSAL - OPTION 1

WFJA operates on Channel 288A at Sanford, North Carolina. WFJA supports the allocation of Channel 276A to Sanford but requests that Channel 276A be substituted for Channel 288A and that WFJA be ordered to change its channel of operation from 288A to 276A. In addition, WFJA requests the deletion of Channel 288A from the Table of Allotments. WFJA believes that the public interest would best be served by the adoption of this counterproposal.

Woolstone's proposed allotment of an additional FM allotment to Sanford does not satisfy any of the first three of the Commission's priorities for choosing between conflicting allocation proposals. Channel 276A would not provide Sanford with a first or second full-time aural service. Sanford already receives a plethora of commercial radio signals. Nor would the proposal in the NPRM

provide Sanford with a first local transmission service. The proposed new station would be the fifth local transmission service in a town of less than 25,000 people. Sanford is already more than adequately served by numerous competing media outlets. Indeed, it is presently one of the most competitive media markets in the United States for a community of fewer than 25,000 persons. As noted, there are four stations licensed to Sanford: WFJA (FM), WDCC (NCE-FM), WWGP(AM) (1050 kHz), and WXXL(AM) (1290 kHz). Moreover, Sanford receives service from numerous full-time FM facilities licensed to communities outside of Sanford. Two LPTV stations, W46BF and WG7CD, operate 24 hours per day. Indeed, Sanford is the only city of its size in the state to have two full-time low power television stations. Accordingly, the allotment of Channel 276A and deletion of Channel 288A would provide Sanford with more than adequate local radio transmission and reception service.

The Commission must, of course, weigh the public interest considerations associated with competing proposals to determine which to adopt. WFJA respectfully submits that its counterproposal will best serve the public interest because it would eliminate two existing "grandfathered" short-spacings. WFJA is presently short-spaced to first adjacent station WFMX, Channel 289C, Statesville, North Carolina, and second adjacent Station WDCG, Channel 286C, Durham, North Carolina. See Technical Statement by Graham Brock, Inc., WFJA's Technical Consultants ("Technical Report"). A copy of the Technical Report is attached as Exhibit A.

Deletion of Channel 288A would eliminate these grandfathered short-spacings. This result would allow WDCG and WFMX to operate on a fully spaced basis. Elimination of these short-spacings would improve the service provided by all three stations and would plainly benefit the listening public.

The Commission has long recognized the substantial public interest benefits which flow from eliminating short-spacings through channel substitutions. See, e.g., FM Table of Allotments, 40 FCC 747, 752 (1963) (adopting original FM Table of Allotments) ("existing stations may be able to resolve short-spacing problems by requesting individual frequency changes"); Columbia, South Carolina, 2 FCC Rcd 2176, 62 R.R. 2d 1168, 1174 (1987) (Commission approved a substitution of channels to eliminate long-standing "grandfathered" short-spacings between petitioner and three other stations), recon. denied, 3 FCC Rcd 6881 (1988). Accord, Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 51 R.R. 2d 807 (1982).

In the Columbia, South Carolina case, the Commission recognized that the elimination of short-spacings is a valid public interest factor to consider under the allotment priorities. The Commission, in its denial of one party's petition to reconsider, rejected the argument that the revision of the FM assignment policies in 1982 deleted the consideration of the elimination of grandfathered short-spacings in FM allotment proceedings. 3 FCC Rec. at 12. The Columbia case recognized the public interest benefits for the approximately 12,000 people who would receive new interference free service as the result of WCOS-FM's frequency switch. The Commission also noted that, in addition to eliminating existing short-spacings, WCOS-FM would be able to extend its service to some 107,000 persons. Id. at 13.

By substituting Channel 276A for Channel 288A, WFJA can upgrade to 6.0 kilowatts and significantly increase the number of people served by the station. Technical Report at ¶7. Allowing WFJA to operate on Channel 276A will allow it to increase the population served by the station by some 16, 599 persons in an additional area of 680.9 square kilometers. WFJA has been unable to take advantage of the rules allowing Class A stations to increase power from 3.0 to 6.0 kilowatts

due to the grandfathered short-spacings between WFJA and both WDCG and WFMX. Technical Report at ¶3. WFJA currently operates with only 2,250 watts of power. Furthermore, WFJA cannot relocate because to do so would cause an extension of its 1.0 mV/m contour in the direction of a short-spaced station which is, of course, prohibited by the rules. Technical Report at ¶3. By changing channels to 276A, WFJA could increase its power and provide radio service to more listeners in the Sanford area. In addition, eliminating Channel 288A at Sanford would reduce interference caused to WDCG by WFJA. Technical Report at ¶9.

In sum, strong public interest benefits support WFJA's counterproposal that the Commission allot 276A to Sanford, North Carolina, order WFJA to move from 288A to 276A and delete 288A from the Table of Allotments. In granting this counterproposal, the Commission will solve a long standing and severe grandfathered short-spacing problem, improve the service to the public of three existing FM stations and allow WFJA, a station that has been in existence since 1950, to upgrade its facilities and serve approximately 80,000 people. The public interest benefits of this proposal significantly outweigh the benefit of adding a fifth local radio station to a city with fewer than 25,000 people.

COUNTERPROPOSAL - OPTION 2

In the alternative, WFJA proposes the allocation of Channel 276A to Robbins, North Carolina, as that community's first local broadcast facility. Robbins is an incorporated community with a current population of approximately 1,000 people.

Analyzing this proposal under the Commission's allotment criteria, WFJA recognizes that allotting Channel 276A will not provide a first or second full-time aural service to Robbins. It, however, will provide a first local broadcast transmission service to Robbins. Therefore, this option

would satisfy the Commission's third criterion. WFJA respectfully submits that the allotment of a first local transmission service to Robbins would better serve the public interest than would allotting a channel to Sanford where it would merely provide a fifth local radio station.

CONCLUSION

WFJA respectfully requests that the Commission grant its counterproposal to allot Channel 276A to Sanford, delete Channel 288A, and order WFJA to move to Channel 276A. If the Commission elects not to adopt this counterproposal then WFJA, in the alternative, requests that the Commission allot Channel 276A to Robbins, North Carolina.

This the 11th day of October, 1995.

Respectfully submitted,

WWGP BROADCASTING CORPORATION

By


Mark J. Prak

By


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GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

COMMENTS AND COUNTERPROPOSAL
WWGP BROADCASTING CORPORATION
MM DOCKET #95-134
ALLOT CHANNEL 276A
SANFORD, NORTH CAROLINA
September 1995

TECHNICAL EXHIBIT

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COMMENTS AND COUNTERPROPOSAL
WWGP BROADCASTING CORPORATION
MM DOCKET #95-134
ALLOT CHANNEL 276A
SANFORD, NORTH CAROLINA
September 1995

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of WWGP Broadcasting Corporation ("WBC"), licensee of radio station WFJA, Channel 288A, Sanford, North Carolina. WBC herein files comments and a counterproposal in response to the Notice of Proposed Rulemaking in MM Docket #95-134 seeking the allotment of Channel 276A to Sanford, North Carolina.

BACKGROUND

2. WBC operates station WFJA on Channel 288A at Sanford, North Carolina, with an effective radiated power of 2.25 kilowatts at 115 meters height above average terrain. The facilities are equivalent to a 3.0 kilowatt 100 meter height above average terrain Class A facility. At its licensed transmitter site, WFJA is shortspaced to first adjacent station WFMX, Channel 289C, Statesville, North Carolina, and second adjacent station WDCG, Channel 286C, Durham, North Carolina. The shortages between WFJA and both WFMX and WDCG were authorized prior to November 16, 1964. The facilities have remained shortspaced since that time. The shortages between the facilities were aggravated as a result of MM Docket #88-375 in which the

maximum effective radiated power of Class A facilities was increased from 3.0 kilowatts to 6.0 kilowatts. This, in turn, necessitated an increase of the minimum distance separation requirements where Class A facilities were involved.

3. Because of the proximity of the WDCG licensed transmitter site, the WFJA protected contour is completely encompassed by the protected 1.0 mV/m contour of WDCG. When WDCG was previously authorized to increase facilities to maintain minimum Class C status, no consideration was given to WFJA pursuant to the former §73.213 spacing requirements for grandfathered stations since second and third adjacent stations were not considered. WFJA, therefore, was not in a position to take advantage of the 6.0 kilowatt Class A upgrade for the station since it would violate current §73.213 regulations regarding the extension of its 1.0 mV/m contour in the direction of a grandfathered shortspace. Attached as Exhibit #1 is a §73.207 spacing study with the relevant spacing requirements and actual distance separations between WFJA, WFMX and WDCG.

4. Woolstone Corporation filed a Petition for Rulemaking seeking to allot Channel 276A to Sanford, North Carolina, as that community's second local FM service.¹ The channel can be allotted to Sanford with a site restriction of 11.3 kilometers.² The proposal was made under §73.207 spacing rules enabling the new channel to specify 6.0 kilowatt 100 meter Class A operation at Sanford.

1) Petition for Rulemaking, Docket #95-134, Paragraph 1.

2) This site restriction is necessary to avoid shortspacing the vacant, but applied for, Channel 275A at Raleigh, North Carolina.

COUNTERPROPOSAL - OPTION I

5. WBC, licensee of radio station WFJA, herein requests that Channel 276A be allotted to Sanford in substitution for Channel 288A and that WFJA be ordered to change channels. In addition, WBC requests the deletion of Channel 288A. Channel 276A can be allotted to Sanford, North Carolina, at geographic reference coordinates North Latitude 35° 24' 36" and West Longitude 79° 15' 34", which represents a site restriction of 11.1 kilometers from the community in order to avoid the shortspacing of the allocation and numerous applications from Channel 275A at Raleigh, North Carolina. As demonstrated on Exhibit #2, Channel 276A can be allotted to Sanford. Exhibit #3 is a usable area map which denotes where a transmitter site could be located for the channel and provide the requisite 3.16mV/m coverage over all of the community of Sanford.

6. Therefore, WBC requests, as Option #1, the following changes to the Commission's Table of Allotments:

Sanford, North Carolina

Present

288A

Proposed

276A

PUBLIC INTERESTS ASPECTS

7. WFJA is currently precluded from being improved to a 6.0 kilowatt Class A facility by virtue of its grandfathered shortspaces to WDCG and WFMX. Further, a relocation of the facility could not be made in compliance with §73.213 of the Commission's rules since the

protected contour of WDCG completely encompasses the 1.0 mV/m contour of WFJA. Any relocation would, therefore, cause an extension of the 1.0 mV/m contour in the direction of a shortspaced station. However, were Channel 276A substituted for Channel 288A it would be feasible for WFJA to implement an upgrade to 6.0 kilowatts, thus, enabling the facility to provide 1.0 mV/m coverage to 78,816 persons in 2,483.2 square kilometers.³ This represents a net increase of 16,599 persons in 680.9 square kilometers over its currently authorized Class A facilities.⁴

8. In addition, the deletion of Channel 288A from Sanford would remove grandfathered shortspaces between the Sanford facility and both WDCG and WFMX. As is denoted on Exhibit #4, a \$73.207 spacing study utilizing the WDCG licensed transmitter site were WFJA to be ordered off Channel 288A, WDCG would comply with current \$73.207 spacing requirements (removing the 46.89 kilometer shortage between the facilities). This would allow WDCG to be fully spaced. In addition, as indicated on Exhibit #5, a similar circumstance will occur were Channel 288A to be deleted from Sanford. WFMX would then become fully spaced at its licensed transmitter site at Statesville, North Carolina.⁵

9. In addition to the removal of these two grandfathered shortspaces, there would also be a reduction in the overall interference of WDCG from WFJA. The 113 dBu contour of WFJA

3) This is based on the hypothetical reference coordinates from the proposed WBC allocation site.

4) A small portion of the licensed WFJA 1.0 mV/m contour is outside the predicted 1.0 mV/m contour (from the allocation reference site). The population and area in this section were considered when determining the net gain area and population.

5) Exhibit #5 indicates a 3.0 kilometer shortspace between WFMX and WZNY, Channel 289C, Augusta, Georgia. The WZNY facilities were authorized pursuant to §73.215 protecting WFMX as a maximum Class C facility. Therefore, \$73.207 would apply to WFMX were it to either improve its facilities further at its existing site or relocate away from the WZNY location.

delivers interference to WDCG. As such, 18 persons in 1.7 square kilometers are receiving interference from WFJA which will be eliminated based on the proposed substitution outlined above.⁶ Although WFMX is not receiving interference from WFJA, WFJA currently receives interference from WFMX as denoted on Exhibit #6. Therefore, of the 63,256 persons theoretically residing in the 1.0 mV/m contour of WFJA, 1,444 persons are unable to receive the station due to interference from WFMX (only 61,812 persons have interference-free reception of WFJA).

10. In addition to the currently authorized facilities of WFJA in Sanford, Sanford is also serviced by station WDCC, Channel 213A, as well as AM stations WWGP, 1050 kHz, and WXXL, 1290 kHz. Therefore, the allotment of Channel 276A to Sanford would be providing fifth local service to the community. In addition to the locally licensed facilities, Sanford receives service from more than five full-time FM facilities outside of Sanford. As indicated on Exhibit #7, the 60 dBu contours of ten stations provide full-time service to all or portions of Sanford.⁷ Additional FM and AM stations also provide service to the community of Sanford, however, since the entire area is already well served, no further stations were considered. Therefore, since there are more than five aural services being delivered to the community from stations not licensed to it, Sanford is adequately served and no white or gray areas exist in or around the community of Sanford.

6) Because WFJA is well within the WDCG 60 dBu contour, the 40 dB desired to undesired ratio to the 113 dB contour of WFJA causes interference to the 71 dB contour of WDCG. The WFJA interfering contour extends .74 kilometers from the WFJA site.

7) WKRR, Channel 222C, Asheboro; WZZU, Channel 230C, Burlington; WQDR, Channel 234C, Raleigh; WKML, Channel 239C, Lumberton; WKIX-FM, Channel 241C, Raleigh; WQSM, Channel 251C1, Fayetteville; WPCM, Channel 266C, Burlington; WRAL, Channel 268C, Raleigh; WDCG, Channel 286C, Durham; and WIOZ-FM, Channel 295C2, Southern Pines, North Carolina. Sanford and the surrounding area are served by five or more of the above stations.

11. The allocation of Channel 276A, as proposed by Woolstone, would provide fifth local service to Sanford, a community which is already receiving more than five full-time aural services in addition to those services licensed to the community. WBC herein requests that Channel 276A be substituted for Channel 288A at Sanford, North Carolina, and that the Woolstone request for the allotment of this channel be denied. When Channel 276A is allotted to Sanford, as a result of the above noted counterproposal, WBC will file an application seeking to make minor changes in the facilities of WFJA.

COUNTERPROPOSAL - OPTION 2

12. As an alternative to the request contained in Option 1, WBC proposes the allocation of Channel 276A to Robbins, North Carolina, as that community's first local broadcast facility. Robbins, North Carolina, is an incorporated community (incorporated in 1943) located in northwestern Moore County. The 1990 Census lists Robbins with a population of 970 persons, although the township's updated figures reflect a current population of 1,002 persons. Robbins has a Mayor and Town Council, provides fire and police coverage for the community and multiple other services (water, sewer and garbage collection). There are numerous businesses and residential areas in Robbins.

13. Channel 276A can be allotted to Robbins without the imposition of a site restriction at geographic coordinates North Latitude 35° 25' 48 and West Longitude 79° 34' 48". Exhibit #8 is a usable area map which denotes where a transmitter site for Robbins should be located to be clear of all other Commission licensed, authorized or proposed facilities. Exhibit #9 is a §73.207 spacing study for Channel 276A at Robbins.⁸

8) Neither Exhibit #8 and #9 considers the proposed mutually exclusive request for Channel 276A at Sanford, North Carolina.

14. Therefore, WBC requests, as Option #2, the following changes to the Commission's

Table of Allotments:

Robbins, North Carolina

Present

Proposed

None

276A

PUBLIC INTEREST MATTERS

15. The allocation of Channel 276A to Robbins, North Carolina, will provide this incorporated community of 1,002 persons with its first local broadcast outlet. A maximum Class A facility at Robbins, North Carolina, will provide 1.0 mV/m service to 53,149 persons in 2,479.4 square kilometers. When Channel 276A is allotted to Robbins, North Carolina, WBC will file an application, FCC Form 301, on a timely basis, seeking authority to construct a new FM station on Channel 276A at Robbins.

16. The foregoing Technical Statement and attached exhibits were prepared on behalf of WWGP Broadcasting Corporation by Graham Brock, Inc., its Technical Consultants. All information relating to FM and AM facilities was extracted from the pertinent NTIA databases as updated on September 1, 1995. We assume no liability for errors or omission in those databases which may be adverse to the requests contained herein. All population information contained herein was extracted from the 1990 Census (PL 94-171 files).

CLEARANCE STUDY FOR WFJA CHANNEL 288A SANFORD, NC
USING PRESENT WFJA SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
35 26 28 N		DATA 09-01-95
79 12 54 W	Current rules spacings	SEARCH 09-26-95
----- CHANNEL 288 -105.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
<hr/>							
WFJA	288A	Sanford	NC	0.0	0.00	115.0	-115.00
LI CN	35 26 28	79 12 54	2.250 kW	115M	0.0	71.5	
WWGP Broadcasting Corporation				BLH-850320KT			
WDCG	286C	Durham	NC	6.1	48.11	95.0	-46.89
LI CN	35 52 20	79 09 29	100.000 kW	317M	29.9	59.0	
Prism Radio Partners, L.P.				BLH-880721KD			
WFMX	289C	Statesville	NC	288.3	141.64	165.0	-23.36
LI CN	35 49 55	80 42 13	100.000 kW	462M	88.0	102.6	
Adventure Four, Inc.				BLH-871007KA			
WDARFM	288C3	Darlington	SC	206.3	139.15	142.0	-2.85
CP ZCN	34 18 58	79 53 17	17.000 kW	122M	86.5	88.3	
Atlantic Broadcasting Company				BPH-931229IC		951029	
>From Channel 288A Per MM Docket #89-326							
WDARFM	288C3	Darlington	SC	206.3	139.15	142.0	-2.85
AP ZCN	34 18 58	79 53 17	17.000 kW	122M	86.5	88.3	
Atlantic Broadcasting Company				BMPH-950224ID			
WRDU	291C	Wilson	NC	68.9	99.86	95.0	4.86
LI CN	35 45 36	78 11 04	100.000 kW	411M	62.1	59.0	
Voyager Communications V, Inc				BLH-840912CR			
WDARFM	288A	Darlington	SC	206.3	139.15	115.0	24.15
LI CN	34 18 58	79 53 17	3.000 kW	85M	86.5	71.5	
Atlantic Broadcasting Company				BLH-810423AE			
>To Channel 288C3 Per MM Docket #89-326							
WXQRFM	288C2	Jacksonville	NC	122.0	191.04	166.0	25.04
LI CN	34 31 10	77 26 52	19.000 kW	242M	118.7	103.2	
HVS Partners				BLH-950612KC			
<hr/>							

CHANNEL 288A SPACING STUDY

**NOTE : THE SHORTAGE TO WDAR-FM IS BASED
ON THE USE, BY DARLINGTON, OF
SECTION 73.215 CONTOUR PROTECTION.**

EXHIBIT #1

**COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995**

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR SANFORD, NORTH CAROLINA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
35 24 36 N		DATA 09-01-95
79 15 34 W	Current rules spacings	SEARCH 09-27-95
----- CHANNEL 276 -103.1 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD276	276A	Sanford	NC	0.0	0.00	115.0	-115.00
AD	35 24 36	79 15 34	0.000 kW	0M	0.0	71.5	
WWGP Broadcasting Corporation							
ALOPEN	275A	Raleigh	NC	51.8	72.01	72.0	0.01
AL N	35 48 31	78 37 56	0.000 kW	0M	44.8	44.8	
MM Docket #84-231 Window Open 06/06/86 Closed 07/31/86							
AP275	275A	Raleigh	NC	52.2	72.53	72.0	0.53
APG CN	35 48 30	78 37 29	3.000 kW	100M	45.1	44.8	
Bernard Dawson BPH-860707NW 880624							
AP275	275A	Raleigh	NC	51.9	73.32	72.0	1.32
APD CN	35 48 55	78 37 13	3.000 kW	100M	45.6	44.8	
Peebles Broadcasting Company BPH-860703ME 870831							
AP275	275A	Raleigh	NC	48.8	73.79	72.0	1.79
APD CN	35 50 44	78 38 38	3.000 kW	99M	45.9	44.8	
Special Markets Media, Inc. BPH-860703MH							
AP275	275A	Raleigh	NC	50.7	75.53	72.0	3.53
APD CN	35 50 18	78 36 41	3.000 kW	100M	46.9	44.8	
Rem Malloy Broadcasting BPH-860627MH 880624							
WAHP.C	273A	Southern Pines	NC	214.6	34.92	31.0	3.92
CFM CN	35 09 04	79 28 40	3.400 kW	133M	21.7	19.3	
Greene Broadcasting, Inc. BMPH-940902IC 950915							
AP275	275A	Raleigh	NC	49.8	76.04	72.0	4.04
APD CN	35 50 59	78 36 56	3.000 kW	100M	47.3	44.8	
Interactive Media BPH-860707MS 870831							
WJMXFM	277C2	Cheraw	SC	210.5	116.43	106.0	10.43
LI CN	34 30 18	79 54 18	50.000 kW	150M	72.4	65.9	
Atlantic Broadcasting Company BLH-921118KA							
WRCQ	278C2	Dunn	NC	125.4	68.32	55.0	13.32
LI CN	35 03 09	78 38 54	48.000 kW	153M	42.5	34.2	
Kinetic Communications, Inc. BLH-900207KB							
WAKG	277C1	Danville	VA	355.7	148.13	133.0	15.13
LI CN	36 44 28	79 23 05	100.000 kW	199M	92.1	82.7	
Piedmont Broadcasting Corporation BLH-900904KB							
WEZC	275C1	Hickory	NC	270.4	169.89	133.0	36.89
LI CN	35 24 26	81 07 47	31.000 kW	468M	105.6	82.7	
Trumper Communications of NC BLH-870904KB							
WSOCFM	279C	Charlotte	NC	263.3	134.46	95.0	39.46
LI CY	35 15 41	80 43 38	100.000 kW	320M	83.6	59.0	
EZ Communication, Inc. BLH-860730KA							

CHANNEL 276A SPACING STUDY

EXHIBIT #3
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995

GRAHAM BROCK, INC.
BROADCAST TECHNICAL CONSULTANTS

CLEARANCE STUDY FOR CHANNEL 286C DURHAM, NC
USING WDCG SITE AS REFERENCE

REFERENCE	CLASS C	DISPLAY DATES
35 52 20 N	Current rules spacings	DATA 09-01-95
79 09 29 W	CHANNEL 286 -105.1 MHz	SEARCH 09-26-95

CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WDCG	286C	Durham	NC	0.0	0.00	290.0	-290.00
LI CN	35 52 20	79 09 29	100.000 kW	317M	0.0	180.2	
Prism Radio Partners, L.P. BLH-880721KD							
WFJA	288A	Sanford	NC	186.1	48.11	95.0	-46.89
LI CN	35 26 28	79 12 54	2.250 kW	115M	29.9	59.0	
WWGP Broadcasting Corporation BLH-850320KT							
WRDJ.C	285C3	Roanoke	VA	337.9	175.52	176.0	-0.48
CP CN	37 20 06	79 54 16	2.500 kW	313M	109.1	109.4	
Susan D. Brown BPH-930728IZ 960719							
>From Channel 285A Per MM Docket #92-32							
WAGIFM	287C	Gaffney	SC	258.7	242.36	241.0	1.36
LI CN	35 25 05	81 46 32	100.000 kW	363M	150.6	149.8	
Gaffney Broadcasting, Inc. BLH-790123AD							
WMSQ.A	286C2	Havelock	NC	116.8	251.29	249.0	2.29
AP CN	34 49 43	76 42 16	50.000 kW	150M	156.2	154.8	
Musicradio of North Carolina, BPH-941019IC							
>From Channel 285A Per MM Docket #86-65							
ALOPEN	286C2	Havelock	NC	116.8	251.40	249.0	2.40
AL N	34 49 42	76 42 12	0.000 kW	0M	156.3	154.8	
MM Docket #86-65							
>Rsvd for WMSQ Per MM Docket #86-65							
ALOPEN	287A	Fair Bluff	NC	177.9	169.14	165.0	4.14
AL N	34 20 55	79 05 24	0.000 kW	0M	105.1	102.6	
MM Docket #84-231							
AD287	287A	Fair Bluff	NC	172.3	169.71	165.0	4.71
AD	34 21 22	78 54 36	0.000 kW	0M	105.5	102.6	
Atlantic Broadcasting Co., Inc. RM8602 950208							
>Vacant Allotment to a Restricted Site.							
WPDT.C	286A	Johnsonville	SC	189.6	231.22	226.0	5.22
CPM CN	33 49 00	79 34 35	4.400 kW	114M	143.7	140.5	
The Waccamaw Neck Broadcasting BMPH-940411IC 950924							
WRDJ.C	287A	Roanoke	VA	335.0	173.31	165.0	8.31
CP CN	37 17 01	79 59 14	3.000 kW	23M	107.7	102.6	
Susan D. Brown BPH-8806020J 931014							
>To Channel 285C3 Per MM Docket #92-32							

CHANNEL 286C SPACING STUDY

NOTE : THE SHORTAGE TO WRDJ.C IS NOTED AS -0.48. SINCE THIS IS LESS THAN 0.49 IT ROUNDS TO ZERO.

EXHIBIT #4

**COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995**

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

CLEARANCE STUDY FOR CHANNEL 289C STATESVILLE, NC
USING WFMX SITE AS REFERENCE

REFERENCE 35 49 55 N 80 42 13 W	CLASS C Current rules spacings CHANNEL 289 -105.7 MHz	DISPLAY DATES DATA 09-01-95 SEARCH 09-26-95
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CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WFMX	289C	Statesville	NC	0.0	0.00	290.0	-290.00
LI CN	35 49 55	80 42 13	100.000 kW	462M	0.0	180.2	
Adventure Four, Inc. BLH-871007KA							
WFJA	288A	Sanford	NC	107.5	141.64	165.0	-23.36
LI CN	35 26 28	79 12 54	2.250 kW	115M	88.0	102.6	
WWGP Broadcasting Corporation BLH-850320KT							
WZNY	289C	Augusta	GA	201.5	287.00	290.0	-3.00
LI ZCN	33 25 15	81 50 19	100.000 kW	356M	178.4	180.2	
Benchmark Radio Acquisition Fund BLH-910705KB							
ALOPEN	291C3	Jefferson	NC	318.8	96.01	96.0	0.01
AL N	36 28 46	81 24 41	0.000 kW	0M	59.7	59.7	
MM Docket #91-137							
>Site Restricted-Rsvd For 890214MG Per MM Docket#91-137							
WAGIFM	287C	Gaffney	SC	244.9	107.42	105.0	2.42
LI CN	35 25 05	81 46 32	100.000 kW	363M	66.8	65.3	
Gaffney Broadcasting, Inc. BLH-790123AD							
WLJQ.C	290A	Colonial Heights	TN	294.9	167.43	165.0	2.43
CP CN	36 27 08	82 23 58	6.000 kW	100M	104.1	102.6	
Murray Communications BPH-900220MM 950930							
>To amend to Channel 290C3 Per MM Docket #93-28							
ALOPEN	290C3	Colonial Heights	TN	289.4	179.46	176.0	3.46
AL N	36 21 11	82 35 24	0.000 kW	0M	111.5	109.4	
MM Docket #93-28							
>Site Restricted-Reserved for WLJQ							
WGQR	289A	Elizabethtown	NC	124.7	231.81	226.0	5.81
LI CN	34 37 38	78 37 23	4.300 kW	118M	144.1	140.5	
Sound Business Inc. BMLH-920504KA							
WDARFM	288C3	Darlington	SC	156.0	183.88	176.0	7.88
AP ZCN	34 18 58	79 53 17	17.000 kW	122M	114.3	109.4	
Atlantic Broadcasting Company BMPH-950224ID							
>From Channel 288A Per MM Docket #89-326							
WDARFM	288C3	Darlington	SC	156.0	183.88	176.0	7.88
CP ZCN	34 18 58	79 53 17	17.000 kW	122M	114.3	109.4	
Atlantic Broadcasting Company BPH-931229IC 951029							
>From channel 288A Per MM Docket #89-326							
WISTFM	291C3	Waxhaw	NC	184.5	105.53	96.0	9.53
LI ZCN	34 53 01	80 47 37	20.000 kW	111M	65.6	59.7	
Union County Communications BLH-950106KA							

CHANNEL 289C SPACING STUDY

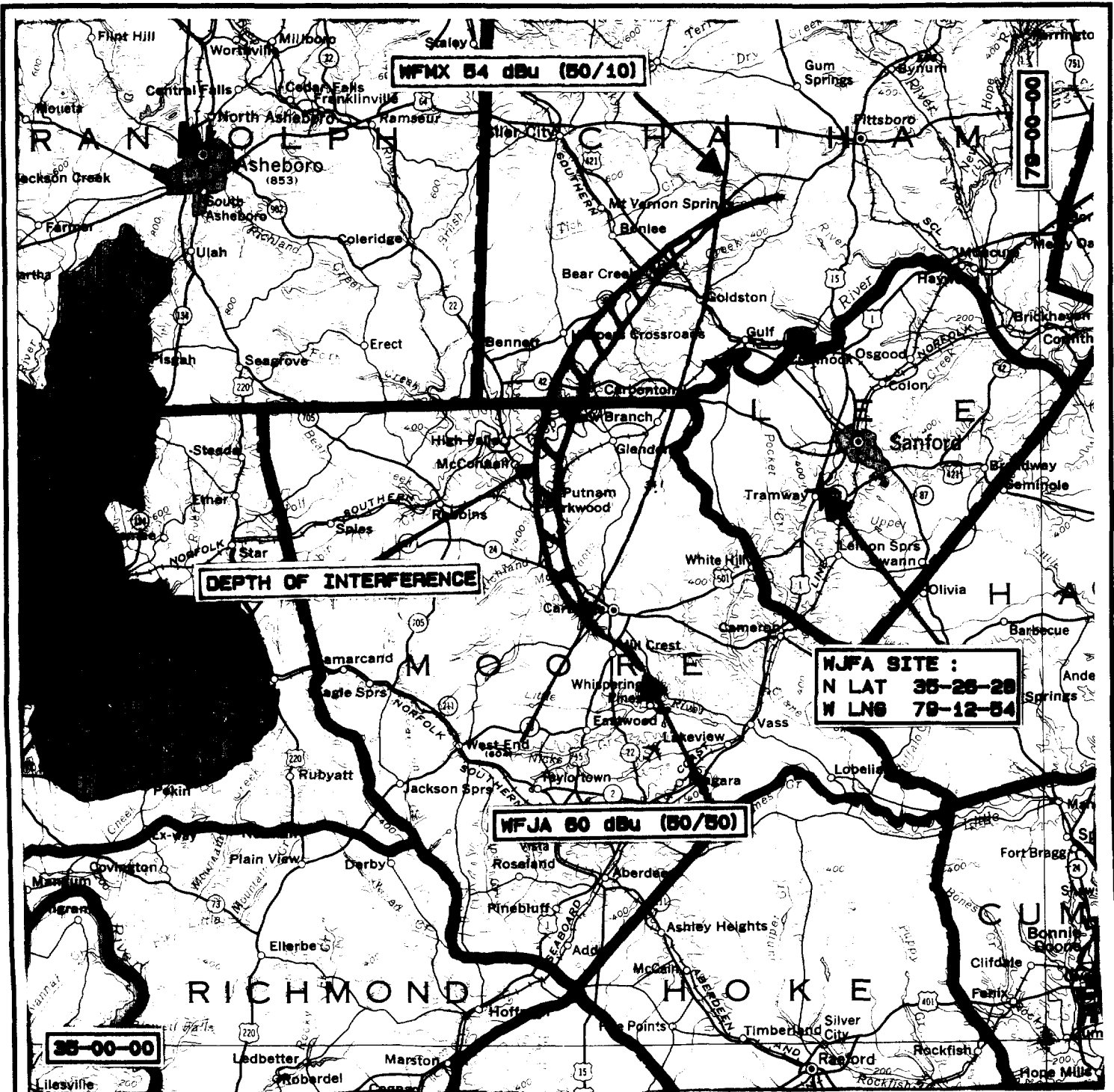
NOTE : THE SHORTAGE TO WZNY IS SHOWN AS -3.00 KILOMETERS. THIS SHORTAGE IS BASED ON THE USE OF SECTION 73.215 RULES, BY THE LICENSEE OF WZNY.

EXHIBIT #5

**COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995**

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



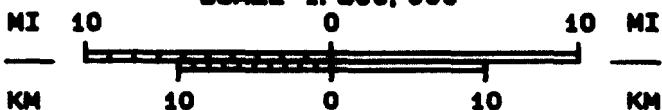
WFJA DEPTH OF INTERFERENCE

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE MAP OF NORTH CAROLINA.

EXHIBIT #6

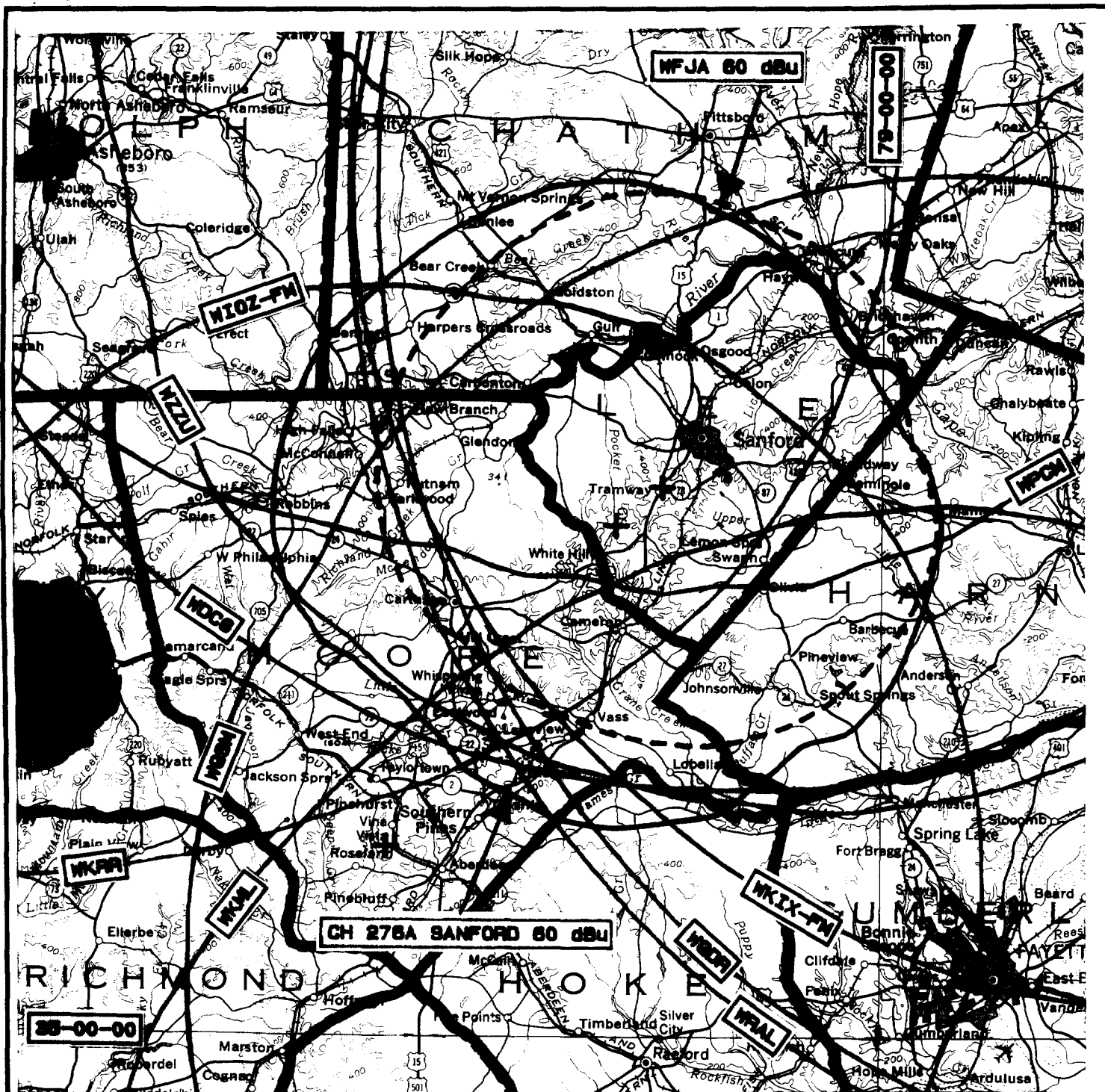
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995

SCALE 1: 500, 000



GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

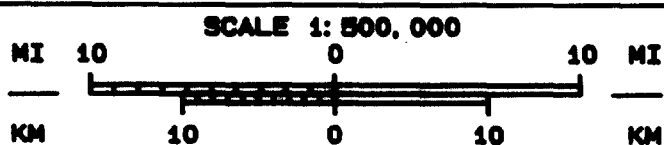


FM SERVICES TO SANFORD, N.C.

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE MAP OF NORTH CAROLINA.

EXHIBIT #7

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995



GRAHAM BROCK, INC.
BROADCAST TECHNICAL CONSULTANTS

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR ROBBINS, NORTH CAROLINA
USING CITY CENTER COORDINATES AS REFERENCE

REFERENCE		CLASS A	DISPLAY DATES
35 25 48 N			DATA 09-29-95
79 34 48 W		Current rules spacings	SEARCH 10-06-95
----- CHANNEL 276 -103.1 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD276	276A	Robbins	NC	0.0	0.00	115.0	-115.00
AD	35 25 48	79 34 48	0.000 kW	0M	0.0	71.5	
WWGP Broadcasting Corp.							
WJMXFM	277C2	Cheraw	SC	196.2	106.82	106.0	0.82
LI CN	34 30 18	79 54 18	50.000 kW	150M	66.4	65.9	
Atlantic Broadcasting Company BLH-921118KA							
WAHP.C	273A	Southern Pines	NC	163.3	32.31	31.0	1.31
CPM CN	35 09 04	79 28 40	3.400 kW	133M	20.1	19.3	
Greene Broadcasting, Inc. BMPH-940902IC 950915							
WEZC	275C1	Hickory	NC	269.4	140.77	133.0	7.77
LI CN	35 24 26	81 07 47	31.000 kW	468M	87.5	82.7	
Trumper Communications of Nor BLH-870904KB							
WSOCFM	279C	Charlotte	NC	260.1	105.95	95.0	10.95
LI CY	35 15 41	80 43 38	100.000 kW	320M	65.8	59.0	
EZ Communication, Inc. BLH-860730KA							
WAKG	277C1	Danville	VA	6.8	146.54	133.0	13.54
LI CN	36 44 28	79 23 05	100.000 kW	199M	91.1	82.7	
Piedmont Broadcasting Corporation BLH-900904KB							
WKRR	222C	Asheboro	NC	333.0	50.29	29.0	21.29
LI DCN	35 49 59	79 50 02	100.000 kW	393M	31.3	18.0	
Dick B/Cng Co.,Inc of North Carolina BLH-851227KB							
ALOPEN	275A	Raleigh	NC	63.6	95.59	72.0	23.59
AL N	35 48 31	78 37 56	0.000 kW	0M	59.4	44.8	
MM Docket #84-231 Windown Open 06/06/86 Closed 07/31/86							
AP275	275A	Raleigh	NC	63.7	96.19	72.0	24.19
APG CN	35 48 30	78 37 29	3.000 kW	100M	59.8	44.8	
Bernard Dawson BPH-860707NW 880624							
AP275	275A	Raleigh	NC	61.1	96.51	72.0	24.51
APD CN	35 50 44	78 38 38	3.000 kW	99M	60.0	44.8	
Special Markets Media, Inc. BPH-860703MH							
AP275	275A	Raleigh	NC	63.4	96.88	72.0	24.88
APD CN	35 48 55	78 37 13	3.000 kW	100M	60.2	44.8	
Peebles Broadcasting Company BPH-860703ME 870831							
AP275	275A	Raleigh	NC	62.3	98.74	72.0	26.74
APD CN	35 50 18	78 36 41	3.000 kW	100M	61.4	44.8	
Rem Malloy Broadcasting BPH-860627MH 880624							
AP275	275A	Raleigh	NC	61.6	98.99	72.0	26.99
APD CN	35 50 59	78 36 56	3.000 kW	100M	61.5	44.8	
Interactive Media BPH-860707MS 870831							

CHANNEL 276A SPACING STUDY

EXHIBIT #9

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 95-134
WWGP BCTG. CORPORATION
WFJA RADIO STATION
SANFORD, NO. CAROLINA
October 1995

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS